

Attorneys for Applicant,  
THE REPUBLIC OF ECUADOR

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

<i>In re</i> Application of:	)	Case No. C-10-80225 MISC CRB (EMC)
	)	
THE REPUBLIC OF ECUADOR,	)	<b>STIPULATION TO ACCEPT SERVICE OF</b>
	)	<b>PROCESS AND FOR BRIEFING</b>
Applicant,	)	<b>SCHEDULE FOR MOTION TO QUASH</b>
	)	<b>ORDER</b>
For the Issuance of a Subpoena for the Taking	)	Date: November 3, 2010
of a Deposition and the Production of	)	Time: 3:00 p.m.
Documents In a Foreign Proceeding Pursuant to	)	Place: Courtroom C, 15th Floor
28 U.S.C. § 1782.	)	450 Golden Gate Avenue
	)	San Francisco, California

The Republic of Ecuador, by and through its counsel, Winston & Strawn LLP, and Diego Fernando Borja Sánchez, also known as Diego Borja ("Borja"), by and through his counsel, Arguedas, Cassman & Headley, LLP, hereby stipulate to the following:

1. Arguedas, Cassman & Headley, LLP, on behalf of Borja, hereby accepts service and acknowledges receipt of the Subpoena to Testify at a Deposition or to Produce Documents in a Civil Action issued in the above referenced case pursuant to the Court's ORDER GRANTING REPUBLIC OF ECUADOR'S EX PARTE APPLICATION FOR THE ISSUANCE OF A SUBPOENA dated September 15, 2010 (the "Subpoena").

2. Borja shall file and serve his motion to quash the Subpoena ("Motion to Quash") no later than October 6, 2010.

3. The briefing schedule and hearing date for the Motion to Quash shall be as follows:

October 6, 2010      Borja's Motion to Quash

October 20, 2010      Republic of Ecuador's Opposition

October 27, 2010      Borja's Reply

November 10, 2010      Hearing at 3:00 p.m. or at such other date or time set by the Court.

4. The current date set for the deposition and production of documents pursuant to the Subpoena, October 1, 2010 at 9:30 a.m., shall be changed to a date at the same time and location that is not more than 28 days (unless otherwise agreed to by the mutual consent of the parties) following the entry of an order denying the Motion to Quash, with documents allowed by such order to be produced to Winston & Strawn LLP not later than 14 days after entry of such order.

////

////

////

////

////

////

Winston & Strawn LLP  
101 California Street  
San Francisco, CA 94111-5802

5. Should Borja fail to file the Motion to Quash as stipulated, then the documents responsive to the Subpoena shall be produced to Winston & Strawn no later than October 13, 2010 and the deposition shall commence on October 27, 2010 at 9:30 a.m. at the San Francisco offices of Winston & Strawn LLP.

Dated: September 24, 2010

WINSTON & STRAWN LLP

By: /s/ Richard A. Lapping

Eric W. Bloom  
C. MacNeil Mitchell  
Richard A. Lapping

Attorneys for Applicant  
The Republic of Ecuador

Dated: September 24, 2010

ARGUEDAS, CASSMAN & HEADLEY, LLP

By: /s/ Michael W. Anderson

Cristina Arguedas  
Michael W. Anderson

Attorneys for  
Diego Fernando Borja Sánchez

IT IS SO ORDERED.

Dated: 9/28/10

EDWARD M. CHEN  
United States

